



Delta Counties Coalition

Contra Costa County · Sacramento County · San Joaquin County · Solano County · Yolo County

"Working together on water and Delta issues"

July 2, 2010

Delta Stewardship Council Members
P. Joseph Grindstaff, Interim Executive Officer
650 Capitol Mall, Fifth Floor
Sacramento, CA 95814

By U.S. Mail and E mail

Subject: Delta Counties Coalition Comments on the First Draft of the Interim Delta Plan

Dear Council Members and Mr. Grindstaff:

This letter provides comments to the Delta Stewardship Council on the first draft of the Interim Delta Plan. Each of the five Delta County Coalition agencies (Contra Costa, Sacramento, San Joaquin, Solano and Yolo Counties) will submit individual comment letters to the Council. We urge the Council to seriously consider and adopt the issues and comments raised in this letter and in each individual county response.

The purpose of this letter is to articulate the common elements of all of the Delta County responses and to emphasize the importance of these major issue areas to the Coalition.

The Delta Counties Coalition summary of major issue areas in the Interim Delta are as follows:

- The Coalition urges the Council to integrate the Delta Protection Commission Land Use and Resource Management Plan (RMP) into the Interim Delta Plan given its status as the only comprehensive land use document covering the entire Primary Zone of the Delta.
- It will be critical for the Interim Delta Plan to closely coordinate work with that of the Central Valley Flood Protection Board (CVFPB) because of the existing flood risks in the Delta and the immense negative impact of inattention to these issues. The number of levees and other flood control facilities in the Delta makes coordination of both plans key to water management success in the region.
- The Interim Delta Plan must take into consideration the impacts of State Water Resource Control Board and Regional Water Quality Control Board actions on Delta water supplies, particularly where habitat restoration efforts will change existing water quality, and ensure full mitigation is available for local governments responsible for enforcing water quality mandates.
- Additionally, the Interim Delta Plan must reinforce the obligation of the United States Bureau of Reclamation and the Department of Water Resources, which operate the for the Central Valley Project and State Water Project, to meet salinity standards for water quality within the Delta.
- The Interim Delta Plan should support dedicated funding for agencies that are responsible for Plan activities such as the Delta Protection Commission (DPC), the State Water Resources Control Board (SWRCB) and the Department of Fish and Game (DFG) among others.

July 2, 2010

Subject: Delta Counties Coalition Comments on the First Draft of the Interim Delta Plan

- The Coalition objects to the moratorium indicated by the statement: "No state or local agency should undertake or approve a project that is potentially a covered action until the Delta Plan is adopted, unless the project is included in the specific exclusions enumerated in SBX7 1." All five Delta counties agree that consulting the Council of pending projects would be warranted, but a full moratorium until January 2012 seems unnecessary.
- Opportunities for public engagement in the development of the Interim Delta Plan should be communicated widely and immediately and include counties, cities, reclamation districts and other local agencies located within the Delta.
- And finally, the Interim Delta Plan should be based on sound science and be peer-reviewed to ensure credibility, accountability and transparency in this important process.

The Delta Counties Coalition appreciates the opportunity to provide these comments to the Council as we are the home to the residents, businesses, recreation facilities and agriculture of the Delta.

As the local government and planning agencies for the Delta we are understandably vigilant and concerned about the development of plans and other actions required by state legislation. We are hopeful the Council will seriously heed our suggestions. We look forward to commenting on additional iterations of the Interim Delta Plan.

Sincerely,



Mary Nejedly Piepho
Supervisor, Contra Costa County



Don Nottoli
Supervisor, Sacramento County



Larry Ruhstaller
Supervisor, San Joaquin County



Michael J. Reagan
Supervisor, Solano County



Mike McGowan
Supervisor, Yolo County